

Exhibit A

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

NATIONWIDE LIFE INSURANCE COMPANY,
a foreign corporation,

Plaintiff/Counter-Defendant,

vs.

Case No. 11-cv-12422-AC-MKM
Hon. Avern Cohn

WILLIAM KEENE, JENNIFER KEENE,
MONICA LYNNE LUPILOFF, NICOLE RENEE
LUPILOFF and NICOLE RENEE LUPILOFF,
PERSONAL REPRESENTATIVE OF THE ESTATE
OF GARY LUPILOFF, DECEASED,

Defendants,

and

MONICA LYNNE LUPILOFF, NICOLE RENEE
LUPILOFF and NICOLE RENEE LUPILOFF,
PERSONAL REPRESENTATIVE OF THE ESTATE
OF GARY LUPILOFF, DECEASED,

AFFIDAVIT OF
JEFFREY M. KAELIN

Defendants/Counter-Plaintiffs and Cross-Plaintiffs,

vs.

WILLIAM KEENE, JENNIFER KEENE,
Individually, jointly and severally,

Defendants/Cross-Defendants.

Michael F. Schmidt (P25213)
Harvey Kruse, P.C.
Attorney for Plaintiff
1050 Wilshire Drive, Suite 320
Troy, MI 48084
248-649-7800

John H. Bredell (P36577)
Bredell & Bredell
Attorney for Defendants,
William & Jennifer Keene
119 N. Huron Street
Ypsilanti, MI 48197
734-482-5000

Albert L. Holtz (P15088)
ALBERT L. HOLTZ, P.C.
Attorney for Monica Lupiloff, Nicole Lupiloff
and Nicole Lupiloff Personal Representative
of the Estate of Gary Lupiloff, deceased

Geoffrey N. Fieger (P30441)
Jeffrey A. Danzig (P36571)
Attorney for Monica Lupiloff,
Nicole Lupiloff and Nicole
Lupiloff, Personal Representative

3910 Telegraph Road, Suite 200
Bloomfield Hills, MI 48146
248-593-5000

of the Estate of Gary Lupiloff,
deceased
19390 West Ten Mile Road
Southfield, MI 48075
248-355-5555

AFFIDAVIT OF JEFFREY M. KAELIN

STATE OF MICHIGAN)
) SS.
COUNTY OF OAKLAND)

Your affiant being first duly sworn deposes and says as follows:

1. If called upon to testify in this matter, I would be competent to testify to the matters set forth herein.
2. I am presently an Oakland County assistant prosecuting attorney and have held this position since 2000.
3. I am familiar with the investigation being conducted by the Royal Oak Police Department into the murder of Gary Lupiloff.
4. Prior to executing this affidavit, I spoke with law enforcement officials who are involved in the investigation into the murder of Gary Lupiloff, including the lead Detective handling this investigation.
5. On March 29, 2013, I was informed by a representative of the Royal Oak Police Department who is knowledgeable about the investigation of the murder of Gary Lupiloff that the investigation is active and on-going.

FURTHER DEPONT SAYTH NOT.



Jeffrey M. Kaelin (P 51249)

Signed and sworn to before me in Oakland County, Michigan, on the 29th day of March,
2013.

Sharon L. Cullen
Notary Public, State of Michigan, Oakland County
My Commission Expires: 07/23/2017
Acting in the County of Oakland